



## **MATANUSKA-SUSITNA BOROUGH**

### **Office of the Borough Manager**

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March 29, 2018

Attn: Ms. Kimberly Jackson  
Ms. Carmell Weathers

Federal Communications Commission  
Wireline Competition Bureau  
Competition Policy Division  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Section 63.71 Application of Matanuska Telephone Association, Inc. Authority to  
Discontinue Certain Services

Subject: Update to the Borough's Feb. 26, 2018 letter to FCC, subject: Objection to  
Matanuska Telephone Association, Inc. (MTA) Application to Discontinue the  
Provision of retail Basic Exchange Telecommunications Radio Service (BETRS) in  
its territory in the State of Alaska, WC Docket No. 17-363, Comp. Pol. File No. 1422.

Dear Ms. Jackson and Ms. Weathers,

The Borough continues to object to discontinuance of BETRS service at this time. The Borough has requested the locations (not the names) of BETRS customers from MTA, however MTA has declined that request citing privacy concerns for their customers. This simply does not provide the Borough any way to determine whether these customers will be left with telephone service or even 911 emergency capability of any kind.

Regarding the MTA references of Satellite phone service: basic satellite service is not possible in many of the Borough's remote areas where its citizens live. This is because the orbits for these satellites, this far north, require an approximate 9 degree look angle, which fundamentally will not work in mountainous areas—*i.e.* most of the Borough's 25,000 square miles is mountainous. The Borough also received confirmation from the Iridium satellite company that their satellite phone would be \$1,069 for their model 9555 and \$1,318 for their model 9575. Additional charges for the Iridium service include \$47 per month (plus FCC

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surcharge), \$1.05 per minute for calls to landlines, and \$.37 per outgoing text message. These charges are significantly higher than costs estimated by MTA in their response.

Regarding the Verizon alternative mentioned by MTA: The Borough has received further confirmation that Verizon has cut back on their service west of the Susitna River and some of their previous areas are no longer covered (the estimated coverage has been reduced from 100 miles to 25 miles). This is also the area where Shell Lake and Shell Mountain are located.


The Borough sees from MTA's update letter of Feb. 26, 2018 they are down to 38 customers remaining with BETRS service, however that statement does not answer the question of whether those 38 customers, or the other 177 customers (from their stated number of 215 in December, 2017), who elected to take the \$400 offered by MTA, are left with any type of emergency phone service.

The Borough reiterates that at a minimum, before it would agree with discontinuance of this BETRS service, it requests to know how these remote customers can be served by other providers individually and specifically. The brevity of this reply is simply because the Borough has no way of obtaining the needed information to determine what providers are covering what areas so our citizens will have emergency phone services. In summary, this service is vital to provide emergency lifesaving services in our Borough. At present, inadequate information is available to assess whether the Borough has alternate emergency communications services available for many of its citizens.

Therefore, the Borough continues to request a one-year extension of this capability by MTA, which will give them time to address each of these 215 customers outlined in their application and help ensure they have alternative solutions.

For additional information you may contact the Deputy Borough Manager, George Hays, via e-mail at [ghays@matsugov.us](mailto:ghays@matsugov.us) or by phone at (907) 861-8405.

Sincerely,

 **ACTING MANAGER**  
for John M. Moosey  
Borough Manager